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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

GUADALUPE ESPARZA }
CARBAJAL }
Plaintiff, }
vs. }
KILOLO KIJAKAZI, Acting }
Commissioner of Social Security, }
Defendant. }
Case No. 1:23-cv-00319-BAM
STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF
TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from June 5, 2023 to August 4, 2023, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due on the same week. For the weeks of June 5, 2023 and June 12, 2023, Counsel

1 currently has 26 merit briefs. Counsel requires additional time to brief the issues
2 thoroughly for the Court's consideration. Defendant does not oppose the requested
3 extension. Counsel apologizes to the Defendant and Court for any inconvenience
4 this may cause.

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6 Respectfully submitted,

7 Dated: May 24, 2023 PENA & BROMBERG, ATTORNEYS AT LAW
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9 By: /s/ Jonathan Omar Pena
10 JONATHAN OMAR PENA
11 Attorneys for Plaintiff

12
13 Dated: May 24, 2023 PHILLIP A. TALBERT
14 United States Attorney
15 MATHEW W. PILE
16 Associate General Counsel
17 Office of Program Litigation
Social Security Administration

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19 By: */s/ Franco L. Becia
20 Franco L. Becia
21 Special Assistant United States Attorney
22 Attorneys for Defendant
(*As authorized by email on May 24, 2023)

ORDER

Pursuant to stipulation and good cause appearing, Plaintiff shall serve Defendant with Plaintiff's Motion for Summary Judgment on or before August 4, 2023. All other dates in the Court's Scheduling Order shall be extended accordingly.

IT IS SO ORDERED.

Dated: May 25, 2023

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE